

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-08-KAJ
	:	
	:	
RICHARD REID,	:	
	:	
Defendant.	:	

**MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

Defendant, Richard Reid, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by May 19, 2006.
2. Defense counsel requires additional time to sufficiently review the discovery in the present case and additional time to meet with Mr. Reid to discuss how the defense is going to proceed, before it can be determined what, if any, pre-trial motions need to be filed.
3. Defense counsel will be out of the office from May 30, 2006 through June 2, 2006, and out of the office from June 21, 2006 through June 27, 2006, and respectfully requests that the time in which to file pre-trial motions be extended to anytime after July 6, 2006. This will give counsel adequate time to review the discovery and to meet with and discuss the case with Mr. Reid.
4. The parties have agreed that any additional time given in which to file pre-trial

motions will be excludable under the Speedy Trial Act.

5. AUSA Dave Hall, the attorney handling the case for the government, does not object to the enlargement of time.

6. It is respectfully requested that the time for Defendant to file pre-trial motions be extended to anytime after July 6, 2006.

Respectfully Submitted,

/s/  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Richard Reid

Dated: May 18, 2006

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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v.	:	Criminal Action No. 06-08-KAJ
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	:	
RICHARD REID,	:	
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

The undersigned attorney for defendant Richard Reid hereby certifies that a copy of Defendant's Motion to Extend Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on May 18, 2006, to:

Dave Hall, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

/s/ \_\_\_\_\_  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Richard Reid

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Criminal Action No. 06-08-KAJ

**ORDER**

Having considered Defendant's Motion to Extend Time to File Pretrial Motions,

**IT IS HEREBY ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2006, that  
Defendant Reid's pretrial motions shall be due on the \_\_\_\_\_ day of \_\_\_\_\_  
, 2006.

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Honorable Kent A. Jordan  
United States District Court